

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
: :
: : Bankruptcy No. 19-12843
JOHN S. CARNES, JR. :
Debtor :
:

**ENTRY OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS, RECEIPT OF
NOTICES, AND INCLUSION ON NOTICE LIST**

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, our client respectfully requests that all notices given or required to be given in this case and in any adversary proceedings by the Court, the Debtors, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to our client and the undersigned counsel at the addresses and to the persons, telephone numbers and telecopier set forth below. This request includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

Branch Banking & Trust Company
BB&T SA Bankruptcy Section
PO Box 1847
Wilson NC 27894-1847

Attorney and Address:
Joseph P. Schalk, Esquire
Barley Snyder
213 Market Street-12th Fl
Harrisburg, PA 17101
Telephone No: (717) 399.1562
Email Address: JSchalk@barley.com
Email Address: tshober@barley.com

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have

orders in non-core matters entered only after de novo review by a District Judge, (ii) client's right to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

DATED: November 25, 2019

By: /s/ Joseph P. Schalk, Esquire
Joseph P. Schalk, Esquire
Barley Snyder

We hereby certify that copies of this Entry of Appearance were served by U.S. First Class Mail, postage prepaid, upon the following entities on the date hereof:

Debtor:

John S. Carnes, Jr.
259 Daleville Road
Cochranville, PA 19330

Trustee:

William C. Miller, Esq.
PO Box 1229
Philadelphia, PA 19105

U.S. Trustee:

U.S. Trustee
Office of the U.S. Trustee
200 Chestnut Street, Ste 502
Philadelphia, PA 19106

Debtor's Counsel:

Joseph F. Claffy
Joseph F. Claffy & Associates, P.C.
26 South Churst St – Ste 1 South
West Chester, PA 19382